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10 Defendants

11 **HIDDEN EMPIRE HOLDINGS, LLC,**
12 **HYPER ENGINE, LLC, AND DEON**
13 **TAYLOR;** and Third-Party Defendant
14 **ROXANNE TAYLOR**

15 **UNITED STATES DISTRICT COURT**
16 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

17 HIDDEN EMPIRE HOLDINGS,
18 LLC; a Delaware limited liability
19 company; HYPER ENGINE, LLC; a
20 California limited liability company;
21 DEON TAYLOR, an individual,

22 Plaintiffs,

23 vs.

24 DARRICK ANGELONE, an
25 individual; AONE CREATIVE LLC,
26 formerly known as AONEE
27 ENTERTAINMENT LLC, a Florida
28 limited liability company; and ON
CHAIN INNOVATIONS LLC, a
Florida limited liability company,

Defendants.

DARRICK ANGELONE, an
individual; AONE CREATIVE LLC,
formerly known as AONE

Case No. 2:22-cv-06515-MWF-AGR

The Hon. Michael W. Fitzgerald

**PLAINTIFFS' STATEMENT OF
UNCONTROVERTED FACTS**

HEARING:

DATE: August 18, 2025

TIME: 10:00 a.m.

LOCATION: Courtroom 5A



1 ENTERTAINMENT LLC, a Florida
2 limited liability company; ON
3 CHAIN INNOVATIONS LLC, a
4 Florida limited liability company

5 Counterclaimants,

6
7 HIDDEN EMPIRE HOLDINGS,
8 LLC; a Delaware limited liability
9 company; HYPERENGINE, LLC; a
10 California limited liability company,
11 DEON TAYLOR, an individual,

12 Counterclaim
13 Defendants,

14 DARRICK ANGELONE, an
15 individual; AONE CREATIVE LLC,
16 formerly known as AONE
17 ENTERTAINMENT LLC, a Florida
18 limited liability company; ON
19 CHAIN INNOVATIONS LLC, a
20 Florida limited liability company,

21 Third-Party Plaintiffs

22 v.

23 ROXANNE TAYLOR, an
24 individual, Third-Party Defendant
25
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Pursuant to Central District Rule No. 56-1, Plaintiffs hereby submit their Statement of Uncontroverted Facts.

<u>No</u>	<u>Uncontroverted Facts</u>	<u>Source</u>
1.	On April 26, 2012, Hidden Empire Film Group LLC, an entity affiliated with HEFG entered into a written agreement with AOne Entertainment LLC (the “2012 Agreement”), an entity owned by Mr. Angelone.	<i>See</i> Ex. 1 to R.Tayl or Decl.
2.	Under the terms of the 2012 Agreement, HEFG engaged AOne Entertainment LLC as an independent contractor to design, develop and manage HEFG’s websites and related media properties.	<i>Id.</i>
3.	The 2012 Agreement provided that: (a) AOne would be paid a fee, not to exceed \$25,000, for Angelone’s services in connection with the design and development of two HEFG websites; (b) HEFG would retain <u>all</u> rights in and to any resulting intellectual property; and (c) all such HEFG intellectual property would be turned over by Angelone/AOne immediately upon demand by HEFG.	<i>Id.</i>
4.	The 2012 Agreement provided that Mr. Angelone could not claim ownership in HEFG’s domain names:	<i>Id.</i>
5.	Between 2012 and 2022, AOne and its principal, Darrick Angelone, provided a variety of information technology services to HEFG, Deon Taylor and other individuals affiliated with HEFG.	R.Tayl or Decl. ¶ 5.

1	6.	AOne provided the following specific services for HEFG and	<i>Id.</i>
2		Hyper Engine: (a) hosting the domains of HEFG, HEFG's related	
3		entities and Hyper Engine; (b) making sure the domain	
4		registrations were current; (c) designing, developing and	
5		maintaining the HEFG and Hyper Engine websites; (d)	
6		maintaining and renewing the registrations for the HEFG Google	
7		workspace accounts used for HEFG emails, contacts, calendars,	
8		etc.; (e) maintaining the servers hosting the HEFG websites; (f)	
9		creating social profiles for, posting content on and managing the	
10		social media accounts (Instagram, Facebook, Twitter, LinkedIn)	
11		of HEFG, the HEFG initiatives and the personal accounts of	
12		certain HEFG personnel; (g) publishing Hyper Engine content on	
13		YouTube, Instagram and Facebook; (h) copywriting; (i) managing	
14		paid digital media campaigns and handling digital marketing	
15		campaigns for HEFG film releases.	
16	7.	Any time AOne provided services, it sent an invoice to HEFG	<i>Id.</i> ¶ 9.
17		personnel itemizing the work performed and the charged fee. <i>Id.</i>	
18		HEFG has paid in full all of the invoices it has received from	
19		AOne.	
20	8.	Since securing the HEFG Domain, HEFG has been the owner of	R.Tayl
21		it, and it has never agreed to sell, transfer or assign said domain to	or
22		any other person or non- HEFG entity	Decl. ¶
23			8.
24	9.	At Angelone's urging, HEFG later transferred the HEFG Domain	<i>Id.</i> ¶
25		from the HEFG GoDaddy Account to an HEFG account with a	12
26		company called Namecheap (the "HEFG Namecheap Account").	
27	10	Unbeknownst to HEFG and without its authorization, Angelone	<i>Id.</i> ¶
28	.	and AOne registered the HEFG Namecheap Account in AOne's	12.

1		name and, despite repeated demands in 2022, they refused to	
2		provide the login credentials for the HEFG Namecheap Account	
3		to anyone at HEFG.	
4	11	In late 2014, Angelone convinced HEFG to allow AOne to	R.Tayl
5	.	manage all of the HEFG domains (including domains related to	or
6		the company name and its various businesses as well as its films	Decl. ¶
7		and initiatives) and the domains for Hyper Engine and HEFG	20.
8		personnel (collectively, the “Domains”).	
9	12	Since 2014, AOne has been responsible for securing and/or	<i>Id.</i> ¶
10	.	managing on HEFG’s behalf various domains using a variation of	22.
11		the HEFG name including the following	
12		Domains:hiddenempirefilmgroup.com, hiddenempirefilms.com,	
13		hiddenempiremediagroup.com, hiddenempiremedia.com,	
14		hiddenempirereleasing.com, hiddenempireproductions.com,	
15		hiddenempire.productions, hiddenempire.media,	
16		hiddenempiremedia.group, hiddenempire.studio,	
17		hiddenempire.org, hiddenempireentertainment.com,	
18		foreveryoungfabrics.com, hiddenempirestudios.com, hefg.com,	
19		and hiddenempire.productions.	
20	13	Since 2014, AOne has also been responsible for securing and/or	<i>Id.</i>
21	.	managing numerous domains related to HEFG films. Those	
22		HEFG films and the corresponding Domains are as follows:	
23		a. “Fatale” – fatale.movie	
24		b. “Intruder” - theintruder.movie	
25		c. “Traffik” – traffik.movie and traffikmovie.com	
26		d. “Meet the Blacks” – meettheblacksmovie.com	
27		and meettheblacksthemovie.com	
28		e. “The House Next Door: Meet the Blacks 2” –	

1		thehousenextdoor.movie	
2		f. “Supremacy” – supremacyfilm.com and	
3		supremacymovie.com	
4		g. “Fear” - fear.movie and fearthemovie.com	
5		h. “Free Agents” - freeagentsmovie.com and	
6		freeagents.movie “Hoop 2” - hoop2film.com	
7		and hooptofilm.com	
8			
9			
10	14	Since 2014, AOne has also been responsible for securing and/or	<i>Id.</i>
11	.	managing the domains based on the names of HEFG personnel	
12		including the following Domains:	
13		a. Deon Taylor (HEFG co-founder) –	
14		deontaylor.com and deontaylorfilms.com	
15		b. Roxanne Avent Taylor (HEFG co-founder) –	
16		Aventviii.com.	
17			
18	15	Since 2014, AOne has been responsible for securing and/or	<i>Id.</i>
19	.	managing the domains related to HEFG initiatives including the	
20		following Domains:	
21		a. Facts Not Politics – factsnotpolitics.com and	
22		factsnotpolitics.org	
23		b. Climb – climborganization.org, climb.org and	
24		climb.network	
25		c. Blackchairshow.com	
26		d. Blackhistoryintwominutes.com	
27		e. 2getherwesavelives.com,togetherwewillsaveliv	
28			

1	es.com,	
2	togetherwewillsavelives.com,togetherwewillsa	
3	velives.org,and	
4	f. 2getherwewillsavelives.com	
5	g. Be.woke.vote	
6		
7	16 Since 2014, AOne also has been responsible for managing the	<i>Id.</i> ¶
8	. Domains for Hyper Engine including: hyperenginellc.com and	23.
9	hyperengine.ai.	
10	The foregoing Domains were either registered by HEFG	
11	itself or HEFG requested that AOne register them on HEFG's	
12	behalf and in HEFG's name.	
13	17 Several years ago, Angelone set up HEFG's corporate email	<i>Id.</i> ¶
14	. system using the Google Workspace (formerly GSuite) tied to the	14.
15	HEFG Domain (the "HEFG Google Account"). R.Taylor Decl. ¶	
16	14. As part of AOne setting up the HEFG Google Account,	
17	Angelone obtained the login credentials to HEFG's Google	
18	Account so he could complete the set up and deployment of the	
19	HEFG personnel email addresses on HEFG's behalf. <i>Id.</i> At that	
20	point, Angelone provided Roxanne Taylor with the HEFG Google	
21	Account login credentials. <i>Id.</i>	
22	18 After setting up the HEFG Google Account, Angelone created	<i>Id.</i> ¶¶
23	. individual email accounts for HEFG personnel and its support	15-16.
24	team using the HEFG Domain. All of the HEFG email addresses	
25	are tied to the HEFG Domain and the HEFG Google Account. <i>Id.</i>	
26	¶ 15.	
27	Each individual HEFG email account has been regularly	
28		

1		used by HEFG personnel to conduct HEFG business.	
2	19	Said email accounts served as the primary method of	<i>Id.</i>
3		communication amongst HEFG personnel and between HEFG	¶16.
4		personnel and non-HEFG individuals and companies about HEFG	
5		business. <i>Id.</i> HEFG personnel also circulate banking and	
6		financial information through their HEFG email accounts, and use	
7		their HEFG Google account to store and manage important files	
8		like contracts for various HEFG projects. <i>Id.</i>	
9			
10	20	At some point unknown to HEFG, Angelone changed the login	<i>Id.</i> ¶
11	.	credentials to the HEFG Google Account and he has not provided	36.
12		the new login credentials to HEFG.	
13	21	On August 22, 2022, Mr. Angelone sent a series of text messages	Ex. 23
14	.	to Deon evidencing that he had reviewed emails of HEFG	to D.
15		personnel without authorization. Angelone was not an author or	Taylor
16		recipient of any of the emails he provided to Deon by text.	Decl.
17	22	In addition, on August 25, 2022, Angelone's counsel sent an	R.
18	.	email to Plaintiffs' counsel attaching purported emails and other	Taylor
19		documents Angelone had gathered. In fact, the only way	Decl. ¶
20		Angelone could have obtained the documents in question was by	48
21		reviewing Deon and Roxanne Taylor's personal and private	
22		emails without their consent. These documents included attorney-	
23		client privileged communications.	
24			
25	23	On October 27, 2022, Roxanne Taylor received an email from	Ex. 14
26	.	Google's Account Recovery Team. In that email, Google stated:	to Erin
27		"I understand that you want to restore the emails that have been	Burke
28		deleted. Please be informed that you have already created a new	Decl.



1		workspace account and the previous account has been completely	
2		deleted thus there is no possibility to restore these emails/users	
3		data. . . Since the deletion had been performed by the existing	
4		admin in workspace and we never promise for any user data/files	
5		that has been deleted . . .”	
6			
7	24	On October 27, 2022, Roxanne Taylor received an email from	<i>Id.</i>
8	.	Google’s Account Recovery Team. In that email, Google stated:	
9		“I understand that you want to restore the emails that have been	
10		deleted. Please be informed that you have already created a new	
11		workspace account and the previous account has been completely	
12		deleted thus there is no possibility to restore these emails/users	
13		data. . . Since the deletion had been performed by the existing	
14		admin in workspace and we never promise for any user data/files	
15		that has been deleted . . .”	
16			
17			
18	25	Angelone’s actions have had a devastating effect on Plaintiffs’	R.
19	.	business, as it has been a struggle to recover from the loss of so	Taylor
20		much of Plaintiffs’ business information that the company	Decl. ¶
21		accumulated over a decade.	65.
22	26	Based on my investigation, the evidence indicates that after the	Burke
23		Preliminary Injunction was issued, Angelone apparently deleted	Decl. ¶
24		HEFG’s Google Workspace account when he was the	20.
25		administrator of the account.	
26	27	The Twitter Return included information showing that the	Burke
27		historical account was deleted on November 4, 2022 and HEFG’s	Decl. ¶
28		Twitter handle was transferred to “Jacky Jasper,” the same alias	34.

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	of Angelone that is associated with the Nine Icelandic Domains, on January 12, 2023.	

Dated: August 11, 2025

NEWELL LAW GROUP PC

/s/ Felton T. Newell

Attorneys for Plaintiffs and Counter-
Claim Defendants HIDDEN EMPIRE
HOLDINGS, LLC; HYPER ENGINE,
LLC AND DEON TAYLOR; AND
Third-Party Defendant ROXANNE
TAYLOR